

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

SARAH EDMONDSON, et al.,	:	
	:	
Plaintiffs,	:	CIVIL ACTION
	:	NO. 20-CV-485
v.	:	
	:	
KEITH RANIERE, et al.,	:	
	:	
Defendants.	:	
	:	

PLAINTIFFS' MOTION FOR LEAVE TO FILE AN AMENDED COMPLAINT

Pursuant to this Court's Order, ECF No. 201, and Fed. R. Civ. P. 15(a)(2), Plaintiffs respectfully file this Motion for Leave to File an Amended Complaint, Memorandum in Support, and a clean version of the proposed Third Amended Complaint, which is attached as Exhibit A to the Memorandum. For the reasons set forth in the Memorandum, Plaintiffs respectfully request that the Court grant their Motion and allow them to file the Third Amended Complaint.

Dated: April 3, 2023

/s/ Zahra R. Dean
Neil L. Glazer
William E. Hoese
Stephen H. Schwartz
Craig W. Hillwig
Zahra R. Dean
Aarthi Manohar
Elias Kohn
KOHN, SWIFT & GRAF, P.C.
1600 Market Street, Suite 2500
Philadelphia, PA 19103
(215) 238-1700

Aitan D. Goelman
Bryan M. Reines
ZUCKERMAN SPAEDER
1800 M Street NW, Suite 1000
Washington, DC 20036
(202) 778-1800

Attorneys for Plaintiffs